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Attorney for Defendant
Carlos Lee Sanchez, Jr.

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICKY LEE WARE,
KIMBERLY ANN WALLACE and
CARLOS LEE SANCHEZ, Jr.

Defendants.

CASE NO. 2:24-CR-0281-DC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
~~[PROPOSED]~~ FINDINGS AND ORDER

DATE: September 12, 2025

TIME: 9:30 a.m.

COURT: Hon. Dena M. Coggins

The United States of America through its undersigned counsel, Nicholas Fogg, Assistant United States Attorney, together with counsel for defendant Ricky Lee Ware, Linda Parisi, Esq., counsel for defendant Kimberly Ann Wallace, Candice L. Fields, Esq., and, counsel for defendant Carlos Lee Sanchez, Jr., John R. Manning, hereby stipulate the following:

1. By previous order, this matter was set for status conference on September 12, 2025, at 9:30 a.m.

2. By this stipulation, the parties now move to continue the matter until December 5, 2025, at 9:30 a.m., and to exclude time between September 12, 2025, and December 5, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] to allow defense counsel time to prepare. The parties agree and stipulate, and request the Court find the following:

a) The government has produced (and is continuing to produce) discovery in this

1 matter. (The most recent production was July 3, 2025.) To date, the government has produced
2 52,384 pages of investigative reports, photographs and video surveillance evidence and 3000
3 native files. However, the noted volume of discovery does not include the most recent
4 production as that production includes information taken from a seized phone (allegedly
5 belonging to Mr. Sanchez) and is extensive. (Each defense counsel was provided discovery
6 related to device extractions from electronic devices allegedly belong to their, respective,
7 client's. As noted, this discovery is voluminous and in addition to the volume of discovery noted
8 in this paragraph.)

9 b) Counsel for defendants have met with their clients to discuss their respective
10 cases. Defense counsel desire additional time to conduct investigation into the charges, the
11 alleged roles of their respective clients, and to review discovery in this case. Defense counsel
12 will need additional time to discuss potential resolutions with their clients, prepare pretrial
13 motions, and otherwise prepare for trial.

14 c) Counsel for defendants believe that failure to grant the above-requested
15 continuance would deny them the reasonable time necessary for effective preparation, taking into
16 account the exercise of due diligence.

17 d) The government does not object to the continuance.

18 e) Based on the above-stated findings, the ends of justice served by continuing the
19 case as requested outweigh the interest of the public and the defendant in a trial within the
20 original date prescribed by the Speedy Trial Act.

21 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
22 et seq., within which trial must commence, the time period of September 12, 2025 to December
23 5, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
24 Code T4] because it results from a continuance granted by the Court at defendant's request on
25 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
26 best interest of the public and the defendant in a speedy trial.

27 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
28 Speedy Trial Act dictate that additional time periods are excludable from the period within which

1 a trial must commence.

2 IT IS SO STIPULATED.

3
4 Dated: September 8, 2025

/s/ LINDA PARISI

LINDA PARISI

Counsel for Defendant

RICKY LEE WARE

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6
7 Dated: September 8, 2025

/s/ CANDICE L. FIELDS

CANDICE L. FIELDS

Counsel for Defendant

KIMBERLY ANN WALLACE

8
9
10 Dated: September 8, 2025

/s/ JOHN R. MANNING

JOHN R. MANNING

Counsel for Defendant

CARLOS LEE SANCHEZ, Jr

11
12
13 Dated: September 8, 2025

ERIC GRANT

United States Attorney

/s/ NICHOLAS M. FOGG

NICHOLAS M. FOGG

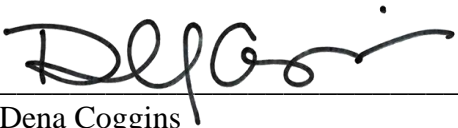
Assistant United States Attorney

ORDER

The court, having received, read and considered the parties' stipulation and good cause appearing therefrom, APPROVES the parties' stipulation. Accordingly, the Status Conference scheduled for September 12, 2025, is VACATED and RESET for December 5, 2025, at 9:30 a.m. in Courtroom 10 before the Honorable Dena M. Coggins. The time period between September 12, 2025 and December 5, 2025 inclusive, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A), and B(iv) [Local Code T4], as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

Dated: September 9, 2025


Dena Coggins
United States District Judge